

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL RICHARD LYNCH AND
STEPHEN KEITH CHAMBERLAIN

Defendants.

CASE NO. 3:18-cr-00577-CRB

**~~[PROPOSED]~~ ORDER GRANTING
DEFENDANT STEPHEN
CHAMBERLAIN'S MOTIONS FOR
ISSUANCE OF RULE 17 SUBPOENAS
AND LETTERS ROGATORY (ECF
NOS. 81 & 87)**

Date: December 1, 2021

Time: 1:30 p.m.

Crtrm.: 6

Assigned to Hon. Charles R. Brever

1 **~~[PROPOSED]~~ ORDER**

2 Good cause having been shown, the Court GRANTS Defendant Stephen
3 Chamberlain's Motion for Issuance of Supoenas Pursuant to Federal Rule of Criminal
4 Procedure 17(c) and Letters Rogatory Pursuant to 28 U.S.C. § 1781 Relating to Daud
5 Khan and Paul Morland (ECF No. 81); and Motion for Issuance of Subpoenas to Reena
6 Prasad, Percy Tejeda, and Ganesh Vaidyanathan Pursuant to Federal Rule of Criminal
7 Procedure 17(c) (ECF No. 87).

8 The Court HEREBY ISSUES the subpoenas and letters rogatory attached to this
9 order.

10 The Court ORDERS the Clerk of the Court to transmit the letters rogatory (Exhibits
11 10 through 12) along with a copy of the Second Superseding Indictment, via both
12 registered mail and email to the U.K. Central Authority at the following address:

13 UK Central Authority
14 International Criminality Unit
15 Home Office
16 3rd Floor Seacole Building
17 2 Marsham Street
18 London SW1P 4DF
19 UKCA-ILOR@homeoffice.gov.uk

20 The Court further ORDERS the Clerk of the Court to notify counsel of record when
21 the letters rogatory have been transmitted, and to promptly advise counsel of record of any
22 response received.

23 DATED: December 1, 2021

24 
25 Honorable Charles R. Breyer
26 United States District Court Judge
27 Northern District of California

28

Exhibit 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

**SUBPOENA TO PRODUCE
DOCUMENTS OR OBJECTS
IN A CRIMINAL CASE**

Case No.: 3:18-cr-00577-CRB

Michael Richard Lynch and Stephen Keith Chamberlain,

Defendant(s).

TO: Reena Prasad

YOU ARE COMMANDED to produce at the place, date, and time specified the document(s) or object(s) indicated below. If compliance would be unreasonable or oppressive, you may file a motion requesting the court to quash or modify the subpoena, to review the documents in camera, or to permit production only pursuant to a protective order.

PLACE

U.S. Courthouse
 450 Golden Gate Ave.
 San Francisco, CA 94102

U.S. Courthouse
 280 South First St.
 San Jose, CA 95113

U.S. Courthouse
 3140 Boeing Ave.
 McKinleyville, CA 95519

U.S. Courthouse
 1301 Clay Street
 Oakland, CA 94612

COURTROOM/JUDGE

6/Hon. Charles R.
 Breyer

DATE AND TIME
 45 days from receipt

If the document(s) or object(s) are produced in advance of the date specified, either to the court in an envelope delivered to the clerk's office or to the issuing attorney whose name and address appears below, no appearance is necessary.

The following document(s) or object(s) shall be produced:

See Attachment 1

NOTE: Subpoena forms requiring the appearance of a witness to testify at a criminal proceeding or to testify and bring documents to a criminal proceeding, must use Form CAND 89A, *Subpoena to Testify in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's website: cand.uscourts.gov.

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

(By) Deputy Clerk

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Gary S. Lincenberg; Bird Marella Boxer Wolpert Nessim Drooks Lincenberg & Rhow PC; 1875 Century Park East, 23rd Floor, Los Angeles, CA 90067-2561; (310) 201-2100; glinenberg@birdmarella.com

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)	FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT	
SERVED BY (PRINT NAME)	TITLE	
DECLARATION OF SERVER		
I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.		
Executed on	DATE	SIGNATURE OF SERVER
		ADDRESS:
ADDITIONAL INFORMATION		

ATTACHMENT 1

Within 45 days of receiving this subpoena, please produce the materials described below to the chambers of Judge Charles R. Breyer, U.S. Courthouse, 450 Golden Gate Ave, San Francisco, CA 94102.

1. Written communications from March 1, 2009 through December 31, 2010, including but not limited to emails, text messages, and messages on chat applications and/or social media platforms, relating to Autonomy Corporation PLC (“Autonomy”) and/or Stephen Chamberlain, between you and (a) Matthew Stephan, (b) Percy Tejeda, (c) Ganesh Vaidyanathan, and/or (d) Brent Hogenson.
2. Written communications relating to your testimony before the Grand Jury on November 1, 2018.
3. Personal records of phone calls between you and Matthew Stephan, Percy Tejeda, Ganesh Vaidyanathan and/or Brent Hogenson from July 1, 2010 through August 31, 2010.
4. Any personal notes, memoranda, journal entries, or other documents in your possession, custody or control concerning Stephen Chamberlain.

Exhibit 2

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

**SUBPOENA TO PRODUCE
DOCUMENTS OR OBJECTS
IN A CRIMINAL CASE**

Case No.: 3:18-cr-00577-CRB

Michael Richard Lynch and Stephen Keith Chamberlain,

Defendant(s).

TO: Percy Tejeda

YOU ARE COMMANDED to produce at the place, date, and time specified the document(s) or object(s) indicated below. If compliance would be unreasonable or oppressive, you may file a motion requesting the court to quash or modify the subpoena, to review the documents in camera, or to permit production only pursuant to a protective order.

PLACE

U.S. Courthouse
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 San Francisco, CA 94102

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 San Jose, CA 95113

U.S. Courthouse
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 McKinleyville, CA 95519

U.S. Courthouse
 1301 Clay Street
 Oakland, CA 94612

COURTROOM/JUDGE

6/Hon. Charles R.
 Breyer

DATE AND TIME
 45 days from receipt

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The following document(s) or object(s) shall be produced:

See Attachment 1

NOTE: Subpoena forms requiring the appearance of a witness to testify at a criminal proceeding or to testify and bring documents to a criminal proceeding, must use Form CAND 89A, *Subpoena to Testify in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's website: cand.uscourts.gov.

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

(By) Deputy Clerk

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Gary S. Lincenberg; Bird Marella Boxer Wolpert Nessim Drooks Lincenberg & Rhow PC; 1875 Century Park East, 23rd Floor, Los Angeles, CA 90067-2561; (310) 201-2100; glinenberg@birdmarella.com

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)	FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT	
SERVED BY (PRINT NAME)	TITLE	
DECLARATION OF SERVER		
I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.		
Executed on	DATE	SIGNATURE OF SERVER
		ADDRESS:
ADDITIONAL INFORMATION		

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1. Written communications from March 1, 2009 through December 31, 2010, including but not limited to emails, text messages, and messages on chat applications and/or social media platforms, relating to Autonomy Corporation PLC (“Autonomy”) and/or Stephen Chamberlain, between you and (a) Reena Prasad, (b) Matthew Stephan, (c) Ganesh Vaidyanathan, and/or (d) Brent Hogenson.
2. Written communications relating to your testimony before the Grand Jury on November 1, 2018.
3. Personal records of phone calls between you and Reena Prasad, Matthew Stephan, Ganesh Vaidyanathan and/or Brent Hogenson from July 1, 2010 through August 31, 2010.
4. Any personal notes, memoranda, journal entries, or other documents in your possession, custody or control concerning Stephen Chamberlain.

Exhibit 3

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

**SUBPOENA TO PRODUCE
 DOCUMENTS OR OBJECTS
 IN A CRIMINAL CASE**

Case No.: 3:18-cr-00577-CRB

Michael Richard Lynch and Stephen Keith Chamberlain,

Defendant(s).

TO: Ganesh Vaidyanathan

YOU ARE COMMANDED to produce at the place, date, and time specified the document(s) or object(s) indicated below. If compliance would be unreasonable or oppressive, you may file a motion requesting the court to quash or modify the subpoena, to review the documents in camera, or to permit production only pursuant to a protective order.

PLACE

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 280 South First St.
 San Jose, CA 95113

U.S. Courthouse
 3140 Boeing Ave.
 McKinleyville, CA 95519

U.S. Courthouse
 1301 Clay Street
 Oakland, CA 94612

COURTROOM/JUDGE

6/Hon. Charles R.
 Breyer

DATE AND TIME

45 days from receipt

If the document(s) or object(s) are produced in advance of the date specified, either to the court in an envelope delivered to the clerk's office or to the issuing attorney whose name and address appears below, no appearance is necessary.

The following document(s) or object(s) shall be produced:

See Attachment 1

NOTE: Subpoena forms requiring the appearance of a witness to testify at a criminal proceeding or to testify and bring documents to a criminal proceeding, must use Form CAND 89A, *Subpoena to Testify in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's website: cand.uscourts.gov.

U.S. MAGISTRATE JUDGE OR CLERK OF COURT	DATE
(By) Deputy Clerk	

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Gary S. Lincenberg; Bird Marella Boxer Wolpert Nessim Drooks Lincenberg & Rhow PC; 1875 Century Park East, 23rd Floor, Los Angeles, CA 90067-2561; (310) 201-2100; glinenberg@birdmarella.com

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)	FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$	
SERVED BY (PRINT NAME)	TITLE	
DECLARATION OF SERVER		
I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.		
Executed on	DATE	SIGNATURE OF SERVER
		ADDRESS
ADDITIONAL INFORMATION		

ATTACHMENT 1

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1. Written communications from March 1, 2009 through December 31, 2010, including but not limited to emails, text messages, and messages on chat applications and/or social media platforms, relating to Autonomy Corporation PLC (“Autonomy”) and/or Stephen Chamberlain, between you and (a) Reena Prasad, (b) Matthew Stephan, (c) Percy Tejeda, and/or (d) Brent Hogenson.
2. Written communications relating to your testimony before the Grand Jury on November 1, 2018.
3. Personal records of phone calls between you and Reena Prasad, Matthew Stephan, Percy Tejeda, and/or Brent Hogenson from July 1, 2010 through August 31, 2010.
4. Any personal notes, memoranda, journal entries, or other documents in your possession, custody or control concerning Stephen Chamberlain.

Exhibit 4

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHEN K. CHAMBERLAIN

**SUBPOENA TO PRODUCE
 DOCUMENTS OR OBJECTS
 IN A CRIMINAL CASE**

Case No.: 3:18-cr-00577-CR

Defendant(s).

TO: Hafeez Bux Daud Khan

YOU ARE COMMANDED to produce at the place, date, and time specified the document(s) or object(s) indicated below. If compliance would be unreasonable or oppressive, you may file a motion requesting the court to quash or modify the subpoena, to review the documents in camera, or to permit production only pursuant to a protective order.

PLACE

U.S. Courthouse
 450 Golden Gate Ave.
 San Francisco, CA 94102

U.S. Courthouse
 280 South First St.
 San Jose, CA 95113

U.S. Courthouse
 3140 Boeing Ave.
 McKinleyville, CA 95519

U.S. Courthouse
 1301 Clay Street
 Oakland, CA 94612

COURTROOM/JUDGE

6/Breyer

DATE AND TIME
 45 days from receipt

If the document(s) or object(s) are produced in advance of the date specified, either to the court in an envelope delivered to the clerk's office or to the issuing attorney whose name and address appears below, no appearance is necessary.

The following document(s) or object(s) shall be produced:

All records and communications in the possession of Hafeez Bux Daud Khan relating to Autonomy, Mr. Stephen Chamberlain, or Dr. Michael Lynch, including but not limited to, electronic or hard copy documents, hand-written notes, reports (and drafts thereof), emails (including emails sent or received by Daud.Khan@gmail.com), chat messages, text messages, social media account communications, voicemails and audio recordings.

NOTE: Subpoena forms requiring the appearance of a witness to testify at a criminal proceeding or to testify and bring documents to a criminal proceeding, must use Form CAND 89A, *Subpoena to Testify in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's website: cand.uscourts.gov.

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

(By) Deputy Clerk

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Gary S. Lincenberg
 Bird, Marella, Boxer, Wolpert, Nessim, Drooks, Lincenberg & Rhow, PC.
 1875 Century Park East, 23rd Floor, Los Angeles, CA 90067-2561
 310-201-2100

CAND 89B (Rev. 6/17) Subpoena to Produce Documents or Objects in a Criminal Case

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)	FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$	
SERVED BY (PRINT NAME)	TITLE	
DECLARATION OF SERVER		
I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.		
Executed on _____	DATE	SIGNATURE OF SERVER
ADDRESS:		
ADDITIONAL INFORMATION		

Exhibit 5

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

**SUBPOENA TO PRODUCE
DOCUMENTS OR OBJECTS
IN A CRIMINAL CASE**

Case No.: 3:18-cr-00577-CR

STEPHEN K. CHAMBERLAIN

Defendant(s).

TO: JP Morgan Chase Bank, N.A

YOU ARE COMMANDED to produce at the place, date, and time specified the document(s) or object(s) indicated below. If compliance would be unreasonable or oppressive, you may file a motion requesting the court to quash or modify the subpoena, to review the documents in camera, or to permit production only pursuant to a protective order.

PLACE

<input checked="" type="checkbox"/> U.S. Courthouse	<input type="checkbox"/> U.S. Courthouse	<input type="checkbox"/> U.S. Courthouse	<input type="checkbox"/> U.S. Courthouse	COURTROOM/JUDGE
450 Golden Gate Ave. San Francisco, CA 94102	280 South First St. San Jose, CA 95113	3140 Boeing Ave. McKinleyville, CA 95519	1301 Clay Street Oakland, CA 94612	6/Breyer

If the document(s) or object(s) are produced in advance of the date specified, either to the court in an envelope delivered to the clerk's office or to the issuing attorney whose name and address appears below, no appearance is necessary.

The following document(s) or object(s) shall be produced:

All communications and documents, in hard copy or electronic form, generated by or sent to Mr. Daud Khan, relating to Autonomy, Mr. Stephen Chamberlain, or Dr. Michael Lynch, including but not limited to chat messages or transcripts, emails (including from daud.khan@cazenove.com, Daud.Khan@jpmorgan.com and Daud.Khan@JPMResearchmail.com), instant messages, Bloomberg communications (including from DKHAN5@Bloomberg.net), voicemails, audio recordings, hand-written notes, and reports (or drafts thereof).

NOTE: Subpoena forms requiring the appearance of a witness to testify at a criminal proceeding or to testify and bring documents to a criminal proceeding, must use Form CAND 89A, *Subpoena to Testify in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's website: cand.uscourts.gov.

U.S. MAGISTRATE JUDGE OR CLERK OF COURT	DATE
(By) Deputy Clerk	

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Gary S. Lincenberg
 Bird, Marella, Boxer, Wolpert, Nessim, Drooks, Lincenberg & Rhow, PC.
 1875 Century Park East, 23rd Floor, Los Angeles, CA 90067-2561
 310-201-2100

CAND 89B (Rev. 6/17) Subpoena to Produce Documents or Objects in a Criminal Case

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)	FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$	
SERVED BY (PRINT NAME)	TITLE	
DECLARATION OF SERVER		
I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.		
Executed on _____	DATE	SIGNATURE OF SERVER
ADDRESS:		
ADDITIONAL INFORMATION		

Exhibit 6

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHEN K. CHAMBERLAIN

**SUBPOENA TO PRODUCE
 DOCUMENTS OR OBJECTS
 IN A CRIMINAL CASE**

Case No.: 3:18-cr-00577-CR

Defendant(s).

TO: Joh. Berenberg, Gossler & Co. KG

YOU ARE COMMANDED to produce at the place, date, and time specified the document(s) or object(s) indicated below. If compliance would be unreasonable or oppressive, you may file a motion requesting the court to quash or modify the subpoena, to review the documents in camera, or to permit production only pursuant to a protective order.

PLACE

U.S. Courthouse
 450 Golden Gate Ave.
 San Francisco, CA 94102

U.S. Courthouse
 280 South First St.
 San Jose, CA 95113

U.S. Courthouse
 3140 Boeing Ave.
 McKinleyville, CA 95519

U.S. Courthouse
 1301 Clay Street
 Oakland, CA 94612

COURTROOM/JUDGE

6/Breyer

DATE AND TIME
 45 days from receipt

If the document(s) or object(s) are produced in advance of the date specified, either to the court in an envelope delivered to the clerk's office or to the issuing attorney whose name and address appears below, no appearance is necessary.

The following document(s) or object(s) shall be produced:

All communications and documents, in hard copy or electronic form, generated by or sent to Mr. Daud Khan, relating to Autonomy, Mr. Stephen Chamberlain, or Dr. Michael Lynch, including but not limited to chat messages or transcripts, emails, text messages, Bloomberg communications, voicemails, audio recordings, hand-written notes, and reports (or drafts thereof).

NOTE: Subpoena forms requiring the appearance of a witness to testify at a criminal proceeding or to testify and bring documents to a criminal proceeding, must use Form CAND 89A, *Subpoena to Testify in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's website: cand.uscourts.gov.

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

(By) Deputy Clerk

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Gary S. Lincenberg
 Bird, Marella, Boxer, Wolpert, Nessim, Drooks, Lincenberg & Rhow, PC.
 1875 Century Park East, 23rd Floor, Los Angeles, CA 90067-2561
 310-201-2100

CAND 89B (Rev. 6/17) Subpoena to Produce Documents or Objects in a Criminal Case

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)	FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$	
SERVED BY (PRINT NAME)	TITLE	
DECLARATION OF SERVER		
I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.		
Executed on _____	DATE	SIGNATURE OF SERVER
ADDRESS:		
ADDITIONAL INFORMATION		

Exhibit 7

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHEN K. CHAMBERLAIN

**SUBPOENA TO PRODUCE
 DOCUMENTS OR OBJECTS
 IN A CRIMINAL CASE**

Case No.: 3:18-cr-00577-CR

Defendant(s).

TO: Paul Gilmer Morland

YOU ARE COMMANDED to produce at the place, date, and time specified the document(s) or object(s) indicated below. If compliance would be unreasonable or oppressive, you may file a motion requesting the court to quash or modify the subpoena, to review the documents in camera, or to permit production only pursuant to a protective order.

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 San Jose, CA 95113

U.S. Courthouse
 3140 Boeing Ave.
 McKinleyville, CA 95519

U.S. Courthouse
 1301 Clay Street
 Oakland, CA 94612

COURTROOM/JUDGE

6/Breyer

DATE AND TIME
 45 days from receipt

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The following document(s) or object(s) shall be produced:

All records and communications in the possession of Paul Morland relating to Autonomy, Mr. Stephen Chamberlain, or Dr. Michael Lynch, including but not limited to, electronic or hard copy documents, hand-written notes, reports (and drafts thereof), emails, chat messages, text messages, social media account communications, voicemails and audio recordings.

NOTE: Subpoena forms requiring the appearance of a witness to testify at a criminal proceeding or to testify and bring documents to a criminal proceeding, must use Form CAND 89A, *Subpoena to Testify in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's website: cand.uscourts.gov.

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

(By) Deputy Clerk

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Gary S. Lincenberg
 Bird, Marella, Boxer, Wolpert, Nessim, Drooks, Lincenberg & Rhow, PC.
 187s5 Century Park East, 23rd Floor, Los Angeles, CA 90067-2561
 310-201-2100

CAND 89B (Rev. 6/17) Subpoena to Produce Documents or Objects in a Criminal Case

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)	FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$	
SERVED BY (PRINT NAME)	TITLE	
DECLARATION OF SERVER		
I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.		
Executed on _____	DATE	SIGNATURE OF SERVER
ADDRESS:		
ADDITIONAL INFORMATION		

Exhibit 8

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHEN K. CHAMBERLAIN

**SUBPOENA TO PRODUCE
DOCUMENTS OR OBJECTS
IN A CRIMINAL CASE**

Case No.: 3:18-cr-00577-CR

Defendant(s).

TO: Northland Capital Partners Limited (previously known as Astaire Securities)

YOU ARE COMMANDED to produce at the place, date, and time specified the document(s) or object(s) indicated below. If compliance would be unreasonable or oppressive, you may file a motion requesting the court to quash or modify the subpoena, to review the documents in camera, or to permit production only pursuant to a protective order.

PLACE

<input checked="" type="checkbox"/> U.S. Courthouse	<input type="checkbox"/> U.S. Courthouse	<input type="checkbox"/> U.S. Courthouse	<input type="checkbox"/> U.S. Courthouse
450 Golden Gate Ave. San Francisco, CA 94102	280 South First St. San Jose, CA 95113	3140 Boeing Ave. McKinleyville, CA 95519	1301 Clay Street Oakland, CA 94612

COURTROOM/JUDGE

6/Breyer

DATE AND TIME
45 days from receipt

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The following document(s) or object(s) shall be produced:

All communications and documents, in hard copy or electronic form, including but not limited to instant messages, texts, emails, voicemails, hand-written notes, reports (including drafts thereof), or audio recordings, generated by or sent to Paul Morland, relating to Autonomy, Mr. Stephen Chamberlain, or Dr. Michael Lynch.

NOTE: Subpoena forms requiring the appearance of a witness to testify at a criminal proceeding or to testify and bring documents to a criminal proceeding, must use Form CAND 89A, *Subpoena to Testify in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's website: cand.uscourts.gov.

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

(By) Deputy Clerk

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Gary S. Lincenberg
 Bird, Marella, Boxer, Wolpert, Nessim, Drooks, Lincenberg & Rhow, PC.
 1875 Century Park East, 23rd Floor, Los Angeles, CA 90067-2561
 310-201-2100

CAND 89B (Rev. 6/17) Subpoena to Produce Documents or Objects in a Criminal Case

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)	FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$	
SERVED BY (PRINT NAME)	TITLE	
DECLARATION OF SERVER		
I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.		
Executed on _____	DATE	SIGNATURE OF SERVER
ADDRESS:		
ADDITIONAL INFORMATION		

Exhibit 9

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHEN K. CHAMBERLAIN

**SUBPOENA TO PRODUCE
 DOCUMENTS OR OBJECTS
 IN A CRIMINAL CASE**

Case No.: 3:18-cr-00577-CR

Defendant(s).

TO: Peel Hunt LLP

YOU ARE COMMANDED to produce at the place, date, and time specified the document(s) or object(s) indicated below. If compliance would be unreasonable or oppressive, you may file a motion requesting the court to quash or modify the subpoena, to review the documents in camera, or to permit production only pursuant to a protective order.

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U.S. Courthouse
 3140 Boeing Ave.
 McKinleyville, CA 95519

U.S. Courthouse
 1301 Clay Street
 Oakland, CA 94612

COURTROOM/JUDGE

6/Breyer

DATE AND TIME
 45 days from receipt

If the document(s) or object(s) are produced in advance of the date specified, either to the court in an envelope delivered to the clerk's office or to the issuing attorney whose name and address appears below, no appearance is necessary.

The following document(s) or object(s) shall be produced:

All communications and documents, in hard copy or electronic form, generated by or sent to Mr. Paul Morland, relating to Autonomy, Mr. Stephen Chamberlain, or Dr. Michael Lynch, including but not limited to chat messages or transcripts, emails, instant messages, texts, voicemails, hand-written notes, audio recordings, and reports (or drafts thereof).

NOTE: Subpoena forms requiring the appearance of a witness to testify at a criminal proceeding or to testify and bring documents to a criminal proceeding, must use Form CAND 89A, *Subpoena to Testify in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's website: cand.uscourts.gov.

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

(By) Deputy Clerk

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Gary S. Lincenberg
 Bird, Marella, Boxer, Wolpert, Nessim, Drooks, Lincenberg & Rhow, PC.
 1875 Century Park East, 23rd Floor, Los Angeles, CA 90067-2561
 310-201-2100

CAND 89B (Rev. 6/17) Subpoena to Produce Documents or Objects in a Criminal Case

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)	FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$	
SERVED BY (PRINT NAME)	TITLE	
DECLARATION OF SERVER		
I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.		
Executed on _____	DATE	SIGNATURE OF SERVER
ADDRESS:		
ADDITIONAL INFORMATION		

Exhibit 10

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
vs.
MICHAEL RICHARD LYNCH AND
STEPHEN KEITH CHAMBERLAIN
Defendants.

CASE NO. 3:18-cr-00577-CRB

**[PROPOSED] LETTER
ROGATORY TO THE UNITED
KINGDOM, CENTRAL
AUTHORITY, INTERNATIONAL
CRIMINALITY UNIT, HOME
OFFICE REQUESTING
MATERIALS FROM DAUD KHAN**

Assigned to Hon. Charles R. Brever

1 The Honorable Charles R. Breyer, United States District Court Judge of the
 2 United States District Court for the Northern District of California, presents his
 3 compliments to the UK Central Authority, International Criminality Unit, Home
 4 Office and requests international assistance, pursuant to the Mutual Legal
 5 Assistance Treaty between the United States and the United Kingdom of Great
 6 Britain and Northern Ireland, to obtain evidence to be used in a criminal proceeding
 7 before this Court in the above-captioned matter.

8 This Court requests the assistance described herein as necessary in the
 9 interests of justice and for the purpose of a full and fair trial. The assistance
 10 requested is that the UK Central Authority compel Hafeez Bux Daud Khan to
 11 produce the documents identified below.

12 **I. FACTUAL BACKGROUND**

13 This request relates to a criminal case brought against Stephen Chamberlain
 14 by the United States of America in the Northern District of California. The Second
 15 Superseding Indictment (“SI”) alleges that Mr. Chamberlain, Dr. Michael Lynch,
 16 and others defrauded purchasers and sellers of Autonomy securities, including,
 17 specifically, Hewlett-Packard Company (“HP”) in connection with its purchase of
 18 Autonomy Corporation plc (“Autonomy”) in August 2011. Mr. Chamberlain is
 19 charged with, *inter alia*, wire and securities fraud, and conspiracy to commit the
 20 same, in violation of 18 U.S.C. §§ 1343, 1348, and 1349. He is also separately
 21 charged with a multi-object conspiracy to conceal the alleged fraud, in violation of
 22 18 U.S.C. § 371. The case against Mr. Chamberlain is in pretrial proceedings at
 23 present. This Letter Rogatory stems from a request by counsel for Mr. Chamberlain
 24 for materials which this Court has found are relevant and material for his defense at
 25 trial and requested in the interests of justice. The charges against Mr. Chamberlain
 26 rely in part on the testimony of Mr. Khan, a former securities analyst who covered
 27 Autonomy, and who has previously testified in related proceedings, including
 28 United States v. Hussain, No. CR 16-462 CRB (Northern District of California), and

1 Autonomy Corp. Ltd. v. Lynch, Claim No. HC-2015-001324 (High Court of Justice,
 2 Chancery Division, London, U.K.). Mr. Khan has testified that Autonomy's senior
 3 management misled him and other market participants regarding Autonomy's
 4 finances and products. The SI alleges that analysts such as Mr. Khan relied on
 5 Autonomy's financial statements that Mr. Chamberlain helped to prepare, and that
 6 Mr. Chamberlain presented deceptive information regarding Autonomy's (i)
 7 revenue from hardware sales; (ii) Original Equipment Manufacturer ("OEM")
 8 revenue; and (iii) cost allocation relating to the launch of its new Structured
 9 Probabilistic Engine ("SPE") product in Q3 2009, among other things. Mr. Khan has
 10 claimed that this inflated financial information led to an inflated share price.

11 The record as of now is materially incomplete, as Mr. Chamberlain currently
 12 has access to only a limited set of Mr. Khan's relevant communications. As such, it
 13 will be critical for Mr. Chamberlain to receive additional evidence from Mr. Khan in
 14 order establish that, contrary to Mr. Khan's testimony, he was not deceived and that
 15 there was no fraudulent scheme.

16 **II. RECIPROCITY**

17 The United States District Court for the Northern District of California
 18 expresses its willingness to provide similar assistance to authorities of the United
 19 Kingdom of Great Britain and Northern Ireland, should the need arise, and to the
 20 extent permissible by law.

21 **III. REIMBURSEMENT FOR COSTS**

22 The United States District Court for the Northern District of California
 23 assures the Central Authority that Mr. Chamberlain stands ready to reimburse the
 24 authorities of the United Kingdom of Great Britain and Northern Ireland for any
 25 costs incurred in executing the requesting court's letters rogatory.

26 **IV. EVIDENCE TO BE OBTAINED**

27 This request is directed to Hafeez Bux Daud Khan's ("Daud Khan"), Flat B,
 28 19 Chetwode Road, London SW17 7RF, for the production of the materials

1 identified below:

2 1. All records and communications in the possession, custody, or control
3 of Hafeez Bux Daud Khan relating to Autonomy, Mr. Stephen Chamberlain, or Dr.
4 Michael Lynch, including but not limited to, electronic or hard copy documents,
5 hand-written notes, reports (and drafts thereof), emails (including emails sent or
6 received by Daud.Khan@gmail.com), chat messages, text messages, social media
7 account communications, voicemails and audio recordings.

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11 DATED: December 1, 2021

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Honorable Charles R. Breyer
United States District Court Judge
Northern District of California
450 Golden Gate Avenue
San Francisco, CA 94102
crbcrd@cand.uscourts.gov

Exhibit 11

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
vs.
MICHAEL RICHARD LYNCH AND
STEPHEN KEITH CHAMBERLAIN
Defendants.

CASE NO. 3:18-cr-00577-CRB

**~~[PROPOSED]~~ LETTER
ROGATORY TO THE UNITED
KINGDOM, CENTRAL
AUTHORITY, INTERNATIONAL
CRIMINALITY UNIT, HOME
OFFICE REQUESTING
MATERIALS FROM PAUL
MORLAND**

Assigned to Hon. Charles R. Brever

1 The Honorable Charles R. Breyer, United States District Court Judge of the
 2 United States District Court for the Northern District of California, presents his
 3 compliments to the UK Central Authority, International Criminality Unit, Home
 4 Office, and requests international assistance, pursuant to the Mutual Legal
 5 Assistance Treaty between the United States and the United Kingdom of Great
 6 Britain and Northern Ireland to obtain evidence to be used in a criminal proceeding
 7 before this Court in the above-captioned matter.

8 This Court requests the assistance described herein as necessary in the
 9 interests of justice and for the purpose of a full and fair trial. The assistance
 10 requested is that the UK Central Authority compel Paul Gilmer Morland to produce
 11 the documents identified below.

12 **I. FACTUAL BACKGROUND**

13 This request relates to a criminal case brought against Stephen Chamberlain
 14 by the United States of America in the Northern District of California. The Second
 15 Superseding Indictment ("SI") alleges that Mr. Chamberlain, Dr. Michael Lynch,
 16 and others defrauded purchasers and sellers of Autonomy securities, including,
 17 specifically, Hewlett-Packard Company ("HP") in connection with its purchase of
 18 Autonomy Corporation plc ("Autonomy") in August 2011. Mr. Chamberlain is
 19 charged with, *inter alia*, wire and securities fraud, and conspiracy to commit the
 20 same, in violation of 18 U.S.C. §§ 1343, 1348, and 1349. He is also separately
 21 charged with a multi-object conspiracy to conceal the Alleged fraud, in violation of
 22 18 U.S.C. § 371. The case against Mr. Chamberlain is in pretrial proceedings at
 23 present. This Letter Rogatory stems from a request by counsel for Mr. Chamberlain
 24 for materials which this Court has found are relevant and material for his defense at
 25 trial and requested in the interests of justice.

26 The charges against Mr. Chamberlain rely in part on the testimony of Mr.
 27 Morland, a former securities analyst who covered Autonomy, and who has
 28 previously testified in related proceedings, including United States v. Hussain, No.

1 CR 16-462 CRB (Northern District of California), and Autonomy Corp. Ltd. v.
 2 Lynch, Claim No. HC-2015-001324 (High Court of Justice, Chancery Division,
 3 London, U.K.). Mr. Morland has testified that Autonomy's senior management
 4 misled him and other market participants regarding Autonomy's finances and
 5 products. The SI alleges that analysts such as Mr. Morland relied on Autonomy's
 6 financial statements that Mr. Chamberlain helped to prepare, and that Mr.
 7 Chamberlain presented 1 deceptive information regarding Autonomy's (i) revenue
 8 from hardware sales; (ii) Original Equipment Manufacturer ("OEM") revenue; and
 9 (iii) cost allocation relating to the launch of its new Structured Probabilistic Engine
 10 ("SPE") product in Q3 2009, among other things. Mr. Morland has claimed that this
 11 inflated financial information led to an inflated share price.

12 The record as of now is materially incomplete, as Mr. Chamberlain currently
 13 has access to only a limited set of Mr. Morland's relevant communications. As such,
 14 it will be critical for Mr. Chamberlain to receive additional evidence from Mr.
 15 Morland in order to establish that, contrary to Mr. Morland's testimony, he was not
 16 deceived and that there was no fraudulent scheme.

17 **II. RECIPROCITY**

18 The United States District Court for the Northern District of California
 19 expresses its willingness to provide similar assistance to authorities of the United
 20 Kingdom of Great Britain and Northern Ireland, should the need arise, and to the
 21 extent permissible by law.

22 **III. REIMBURSEMENT FOR COSTS**

23 The United States District Court for the Northern District of California
 24 assures the UK Central Authority that Mr. Chamberlain stands ready to reimburse
 25 the authorities of the United Kingdom of Great Britain and Northern Ireland for any
 26 costs incurred in executing the requesting court's letters rogatory.

27 **IV. EVIDENCE TO BE OBTAINED**

28 This request is directed to Paul Gilmer Morland ("Paul Morland"), c/o

1 Alvarium Capital, 1st Floor, 10 Old Burlington Street, London, W1S 3AG, for the
2 production of the documents identified below:

3 1. All records and communications in the possession, custody, or control
4 of Paul Morland relating to Autonomy, Mr. Stephen Chamberlain, or Dr. Michael
5 Lynch, including but not limited to, electronic or hard copy documents, hand-written
6 notes, reports (and drafts thereof), emails, chat messages, text messages, social
7 media account communications, voicemails and audio recordings.

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10 DATED: December 1, 2021

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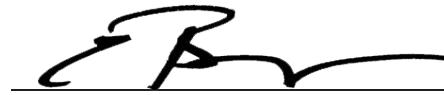
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Honorable Charles R. Breyer
United States District Court Judge
Northern District of California
450 Golden Gate Avenue
San Francisco, CA 94102
crbcrd@cand.uscourts.gov

Exhibit 12

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL RICHARD LYNCH AND
STEPHEN KEITH CHAMBERLAIN

Defendants.

CASE NO. 3:18-cr-00577-CRB

**~~[PROPOSED]~~ LETTER
ROGATORY TO THE UNITED
KINGDOM, CENTRAL
AUTHORITY, INTERNATIONAL
CRIMINALITY UNIT, HOME
OFFICE REQUESTING
MATERIALS FROM NORTHLAND
CAPITAL PARTNERS LIMITED**

Assigned to Hon. Charles R. Brever

1 The Honorable Charles R. Breyer, United States District Court Judge of the
 2 United States District Court for the Northern District of California, presents his
 3 compliments to the UK Central Authority, International Criminality Unit, Home
 4 Office and requests international assistance, pursuant to the Mutual Legal
 5 Assistance Treaty between the United States and the United Kingdom of Great
 6 Britain and Northern Ireland, to obtain evidence to be used in a criminal proceeding
 7 before this Court in the above-captioned matter.

8 This Court requests the assistance described herein as necessary in the
 9 interests of justice and for the purpose of a full and fair trial. The assistance
 10 requested is that the UK Central Authority compel Northland Capital Partners
 11 Limited (formerly Astaire Securities) to produce the materials identified below.

12 **I. FACTUAL BACKGROUND**

13 This request relates to a criminal case brought against Stephen Chamberlain
 14 by the United States of America in the Northern District of California. The Second
 15 Superseding Indictment (“SI”) alleges that Mr. Chamberlain, Dr. Michael Lynch,
 16 and others defrauded purchasers and sellers of Autonomy securities, including,
 17 specifically, Hewlett-Packard Company (“HP”) in connection with its purchase of
 18 Autonomy Corporation plc (“Autonomy”) in August 2011. Mr. Chamberlain is
 19 charged with, *inter alia*, wire and securities fraud, and conspiracy to commit the
 20 same, in violation of 18 U.S.C. §§ 1343, 1348, and 1349. He is also separately
 21 charged with a multi-object conspiracy to conceal the alleged fraud, in violation of
 22 18 U.S.C. § 371. The case against Mr. Chamberlain is in pretrial proceedings at
 23 present. This Letter Rogatory stems from a request by counsel for Mr. Chamberlain
 24 for materials which this Court has found are relevant and material for his defense at
 25 trial and requested in the interests of justice.

26 The charges against Mr. Chamberlain rely in part on the testimony of Mr.
 27 Morland, a former securities analyst who covered Autonomy, and who has
 28 previously testified in related proceedings, including *United States v. Hussain*, No.

1 CR 16-462 CRB (Northern District of California), and *Autonomy Corp. Ltd. v.*
 2 *Lynch*, Claim No. HC-2015-001324 (High Court of Justice, Chancery Division,
 3 London, U.K.). Mr. Morland has testified that Autonomy's senior management
 4 misled him and other market participants regarding Autonomy's finances and
 5 products. The SI alleges that analysts such as Mr. Morland relied on Autonomy's
 6 financial statements that Mr. Chamberlain helped to prepare, and that Mr.
 7 Chamberlain presented deceptive information regarding Autonomy's (i) revenue
 8 from hardware sales; (ii) Original Equipment Manufacturer ("OEM") revenue; and
 9 (iii) cost allocation relating to the launch of its new Structured Probabilistic Engine
 10 ("SPE") product in Q3 2009, among other things. Mr. Morland has claimed that this
 11 inflated financial information led to an inflated share price.

12 The record as of now is materially incomplete, as Mr. Chamberlain currently
 13 has access to only a limited set of Mr. Morland's relevant communications. As such,
 14 it will be critical for Mr. Chamberlain to receive additional evidence from Mr.
 15 Morland in order to establish that, contrary to Mr. Morland's testimony, he was not
 16 deceived and that there was no fraudulent scheme.

17 **II. RECIPROCITY**

18 The United States District Court for the Northern District of California
 19 expresses its willingness to provide similar assistance to authorities of the United
 20 Kingdom of Great Britain and Northern Ireland, should the need arise, and to the
 21 extent permissible by law.

22 **III. REIMBURSEMENT FOR COSTS**

23 The United States District Court for the Northern District of California
 24 assures the UK Central Authority that Mr. Chamberlain stands ready to reimburse
 25 the authorities of the United Kingdom of Great Britain and Northern Ireland for any
 26 costs incurred in executing the requesting court's letters rogatory.

27 **IV. EVIDENCE TO BE OBTAINED**

28 Mr. Morland worked at Astaire Securities from July 2008 through October

1 2010, and reported on and communicated about Autonomy throughout his period of
2 employment. Therefore, Mr. Morland's communications and documents from this
3 period will be relevant to his coverage of Autonomy and to whether or not he was
4 deceived.

5 This request is directed to Northland Capital Partners Limited (formerly
6 Astaire Securities), Prince Fredrick House, 35-39 Maddox Street, London W1S 2PP,
7 for the production of the materials identified below:

8 1. All communications and documents , in hard copy or electronic form,
9 including but not limited to instant messages, texts, emails, voicemails, hand-written
10 notes, reports (including drafts thereof), or audio recordings, generated by or sent to
11 Paul Morland, relating to Autonomy, Mr. Stephen Chamberlain, or Dr. Michael
12 Lynch.

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DATED: December 1, 2021



Honorable Charles R. Breyer
United States District Court Judge
Northern District of California
450 Golden Gate Avenue
San Francisco, CA 94102
crbcrd@cand.uscourts.gov